



111 South Wacker Drive, Suite 4100
Chicago, IL 60606
Telephone: 312-443-0700
www.lockelord.com

October 25, 2023

VIA ECF

The Honorable Naomi Reice Buchwald
United States District Court, Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *In re LIBOR-Based Fin. Instruments Antitrust Litig.*, 11-md-2262-NRB (S.D.N.Y.)

Dear Judge Buchwald:

We represent HSBC Bank plc (“HSBC”) and write pursuant to the Court’s Individual Rules to respectfully request that HSBC’s opposition to Plaintiffs’ October 22, 2023 letter (ECF 3792), requesting a pre-motion conference to seek issuance of three Letters of Request pursuant to the Hague Convention, be filed under seal. The material to be sealed contain employment and other information designated by HSBC as Confidential or Highly Confidential, as well as communications with the Bank of England which may be protected by foreign laws and/or foreign bank regulatory privileges. *See* Am. Stipulation and Protective Order, ECF No. 1405 ¶¶ 1.3-1.4.

Respectfully submitted,

/s/ J. Matthew Goodin


J. Matthew Goodin
Julia C. Webb
LOCKE LORD LLP
111 South Wacker Drive
Chicago, Illinois 60606
Telephone: (312) 443-0472
Facsimile: (312) 896-6472
jmgoodin@lockelord.com
jwebb@lockelord.com

Roger B. Cowie
LOCKE LORD LLP
2200 Ross Avenue, Suite 2800
Dallas, Texas 75201
Telephone: (214) 740-8000
Facsimile: (214) 740-8800
rcowie@lockelord.com

Counsel for HSBC Bank plc

Defendant’s application to file
their letter under seal is
granted.

So ordered.


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: October 26, 2023
New York, New York